

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

CHAMBERS OF  
PAUL W. GRIMM  
UNITED STATES MAGISTRATE JUDGE

101 W. LOMBARD STREET  
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## Discovery Procedures

1. Counsel are required to have read and comply with the Federal Rules of Civil Procedure, Local Rules of this Court, and the Discovery Guidelines of this court (Appendix A to the Local Rules), except as otherwise specified in these procedures or by order of the court.
2. In cases where a party is represented by more than one attorney of record, no discovery motion, response, or opposition may be filed unless the senior attorney of record has read the contents of the motion, and any supporting memorandum and exhibits.
3. All discovery responses, answers, and disclosures are to be complete and non-evasive, as required by Rule 37(a)(3). Evasive or incomplete discovery responses, answers or disclosures will be deemed to be a failure to respond, answer or disclose. *Id.*
4. If a party responding to a discovery request objects, in whole or part, to the discovery, objections must be specific, non-boilerplate, and supported by particularized facts, where necessary to demonstrate the basis for the objection. Failure to do so constitutes a waiver of the objection. *Marens v. Carrabba's Italian Grill, Inc.* 196 F.R.D. 35 (D. Md. 2000); *Thompson v. HUD*, 199 F.R.D. 168 (D. Md. 2001). Similarly, assertions of privilege or work product immunity as a basis for refusing to provide discovery must be particularized, Rule 26(b)(5), and accompanied by the information required by Discovery Guidelines 6 and 9.c. Failure to do so may be deemed by the court to be a waiver of the privilege/immunity.
4. The following procedures govern the filing of discovery motions (either to compel or for a protective order):
  - a. No discovery motion may be filed without first having conferred with opposing counsel in a good faith effort to resolve the dispute without court involvement. The motion will be accompanied by a certificate describing these efforts.
  - b. Unless otherwise permitted by the court, discovery motions will be electronically filed in letter format, and will not exceed five pages. Oppositions to discovery motions will be electronically filed within five business days of service of the motion, will be in letter format, and will not exceed five pages. Unless permitted by the court, reply memoranda will not be allowed. If permitted, they must be electronically filed within five business days of the filing of the opposition memorandum, will be in letter format, and not exceed three pages. Citation to authority will be specific and limited to the fewest number of citations needed to support an argument. Counsel will cite first to Fourth Circuit precedent, then cases decided by this District Court, before citing authority from other circuits or districts. If no authority has been found from the Fourth circuit or this court, the motion shall affirmatively state this.
  - c. Unless otherwise ordered by the court, discovery motions will be resolved by a telephone hearing scheduled by the court. The party that filed the motion will be responsible for arranging for a court reporter to transcribe the telephone hearing. Within ten business days the party filing the motion will be responsible for submitting to my chambers, but not filing with the clerk's office, a copy of the transcript of the telephone hearing.